

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

FREEDOM COALITION OF DOCTORS FOR  
CHOICE,

Plaintiff,

v.

CENTERS FOR DISEASE CONTROL AND  
PREVENTION,

Defendant.

Civil Action No. 2:23-cv-00009-Z

**MOTION TO PROCEED WITHOUT LOCAL COUNSEL**

Plaintiff seeks leave of the Court to proceed without local counsel and provides the following good cause to do so:

The undersigned counsel resides in and maintains his principal office in this District but does not live within 50 miles of the Amarillo Division courthouse. Counsel is from that area of Texas, however—having grown up in Lubbock and Midland—and is very familiar with Amarillo as well as traveling there from the Dallas area. Counsel has previously attended Court in the Amarillo Division and is able to attend any hearing scheduled by the Court in this case. Counsel will be present at all hearings even if local counsel were required and Plaintiff thus requests that the Court grant this motion to avoid costs associated with hiring additional counsel.

**CONCLUSION**

For the foregoing reasons, Plaintiff requests that the Court grant the motion to proceed without local counsel.

Dated: January 23, 2023

Respectfully submitted,

/s/ John C. Sullivan

John C. Sullivan

S|L LAW PLLC

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2023, a true and correct copy of this Motion was served by CM/ECF on all counsel or parties of record.

/s/ John C. Sullivan  
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**CERTIFICATE OF CONFERENCE**

Defendant has been served in this case but has no appearances yet for an attorney with whom counsel could conference this motion.

/s/ John C. Sullivan  
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